

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
TEXAS STANDARD OIL COMPANY,	§	CASE NO. 08-34031
	§	CHAPTER 11
Debtor.	§	

DEBTOR'S EMERGENCY MOTION TO CONVERT CASE TO CHAPTER 7

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

MOVANT HAS REQUESTED EMERGENCY CONSIDERATION OF THIS MOTION

TO THE HONORABLE JEFF BOHM, UNITED STATES BANKRUPTCY JUDGE:

Texas Standard Oil Company ("Debtor") files this *Emergency Motion to Convert Case to Chapter 7*, and would respectfully show as follows:

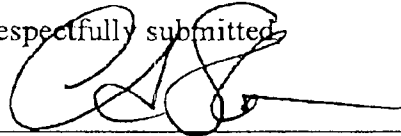
RELIEF REQUESTED

1. Pursuant to 11 U.S.C. § 1112(a), the Debtor may convert this case to Chapter 7.
2. Per the March 18, 2009 Order, the Court estimated administrative claims of the Mariner entities as \$456,000.00. [Docket No. 216].

3. Given the amount of estimated administrative claims, the Debtor has no prospects for reorganization.

WHEREFORE, Texas Standard Oil Company respectfully requests an order of this Court immediately converting this case to Chapter 7, and for such other relief as is just.

Respectfully submitted,



Charley Sharman, Sole Director and Officer
Texas Standard Oil Company
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ATTORNEYS FOR TEXAS STANDARD
OIL COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was served on the parties listed on the attached Service List via ECF or first-class mail, postage prepaid as indicated on March 30, 2009.

/s/ Heather McIntyre

Heather McIntyre

SERVICE LIST

Case No. 08-34031

Debtor

Texas Standard Oil Company
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Via US Mail

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U.S. Trustee

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Parties Requesting Notice

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SERVICE LIST

Case No. 08-34031

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